

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**Holding a Criminal Term**

**Grand Jury Sworn in on November 12, 2010**

<b>UNITED STATES OF AMERICA</b>	:	<b>Criminal No.</b>
	:	
	:	<b>VIOLATIONS:</b>
<b>v.</b>	:	
	:	<b>18 U.S.C. § 1751(c)</b>
	:	<b>(Attempt to Assassinate the President of</b>
	:	<b>the United States)</b>
	:	
<b>OSCAR RAMIRO ORTEGA-</b>	:	<b>18 U.S.C. § 111</b>
<b>HERNANDEZ,</b>	:	<b>(Assaulting an Officer or Employee of the</b>
also known as	:	<b>United States with a Deadly Weapon)</b>
<b>Oscar Ramiro Ortega,</b>	:	
<b>Defendant.</b>	:	<b>18 U.S.C. § 1361</b>
	:	<b>(Injury to Property of the United States)</b>
	:	
	:	<b>18 U.S.C. § 924(c)(1)(A)</b>
	:	<b>(Using, Carrying, Brandishing and</b>
	:	<b>Discharging a Firearm During a Crime</b>
	:	<b>of Violence)</b>
	:	
	:	<b>22 D.C. Code § 402</b>
	:	<b>(Assault with a Dangerous Weapon)</b>
	:	
	:	<b>22 D.C. Code § 4504(b)</b>
	:	<b>(Possession of a Firearm During the</b>
	:	<b>Commission of a Crime of Violence)</b>
	:	
	:	<b>18 U.S.C. § 924(b)</b>
	:	<b>(Interstate Transportation of a Firearm</b>
	:	<b>and Ammunition)</b>

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

**(Attempt to Assassinate the President of the United States)**

On or about November 11, 2011, in the District of Columbia, the defendant, OSCAR ORTEGA-HERNANDEZ, did knowingly attempt to kill the President of the United States, Barack Obama.

**(Attempt to Assassinate the President of the United States,  
in violation of 18 U.S.C. § 1751(c))**

**COUNTS TWO THROUGH FOUR**

**(Assaulting an Officer or Employee of the United States with a Deadly Weapon)**

On or about November 11, 2011, within the District of Columbia, defendant OSCAR ORTEGA-HERNANDEZ knowingly and by means and use of a deadly and dangerous weapon, that is a firearm, did forcibly assault, intimidate, and interfere with the following persons, who are officers or employees of the United States, while they were engaged in their official duties:

COUNT	VICTIM
TWO	Todd Amman
THREE	Carrie Johnson
FOUR	Jeff Lourinia

**(Assaulting an Officer or Employee of the United States with a Deadly Weapon  
in violation of 18 U.S.C. § 111)**

**COUNT FIVE**

**(Injury to Property of the United States)**

On or about November 11, 2011, in the District of Columbia, defendant OSCAR ORTEGA-HERNANDEZ willfully and by means of a firearm did injure property of the United States, that is,

the White House, thereby causing damage in excess of \$1,000.

**(Injury to Property of the United States,  
in violation of 18 U.S.C. § 1361)**

**COUNTS SIX THROUGH TEN**  
**(Using, Carrying, Brandishing and Discharging a  
Firearm During a Crime of Violence)**

On or about November 11, 2011, defendant OSCAR ORTEGA-HERNANDEZ did knowingly use, carry, brandish, and discharge a firearm during and in relation to the following crimes of violence for which he may be prosecuted in a court of the United States:

COUNT	PREDICATE OFFENSE
SIX	Attempt to Assassinate the President of the United States (Count One)
SEVEN	Assaulting an Officer or Employee of the United States (Count Two)
EIGHT	Assaulting an Officer or Employee of the United States (Count Three)
NINE	Assaulting an Officer or Employee of the United States (Count Four)
TEN	Injury to Property of the United States (Count Five)

**(Using, Carrying, Brandishing, and Discharging a Firearm  
During a Crime of Violence, in violation of 18 U.S.C. § 924(c)(1)(A))**

**COUNTS ELEVEN THROUGH THIRTEEN**  
**(Assault with a Dangerous Weapon)**

On or about November 11, 2011, within the District of Columbia, defendant OSCAR ORTEGA-HERNANDEZ assaulted the following persons with a dangerous weapon, that is, a firearm:

COUNT	VICTIM
ELEVEN	Todd Amman
TWELVE	Carrie Johnson
THIRTEEN	Jeff Lourinia

**(Assault with a Dangerous Weapon  
in violation of Title 22, D.C. Code, Section 402 (2001 ed.))**

**COUNTS FOURTEEN THROUGH SIXTEEN  
(Possession of a Firearm During the Commission  
of a Crime of Violence)**

On or about November 11, 2011, defendant OSCAR ORTEGA-HERNANDEZ did possess a firearm while committing the following crimes of violence:

COUNT	PREDICATE OFFENSE
FOURTEEN	Assault with a Dangerous Weapon (Count Eleven)
FIFTEEN	Assault with a Dangerous Weapon (Count Twelve)
SIXTEEN	Assault with a Dangerous Weapon (Count Thirteen)

**(Possession of a Firearm During the Commission of a Crime of Violence,  
in violation of Title 22, District of Columbia Code, Section 4504(b) (2001 ed.))**

**COUNT SEVENTEEN  
(Interstate Transportation of a Firearm and Ammunition)**

Between on or about October 23, 2011, and on or about November 11, 2011, defendant OSCAR ORTEGA-HERNANDEZ did ship, transport, and receive a firearm and ammunition in interstate commerce with an intent to commit an offense therewith punishable by imprisonment for a term exceeding one year, and with knowledge and reasonable cause to believe that an offense

punishable by imprisonment for a term exceeding one year was to be committed therewith, that is,  
as charged in Counts One through Five of this Indictment.

**(Interstate Transportation of a Firearm and Ammunition,  
in violation of 18 U.S.C. § 924(b))**

A TRUE BILL

FOREPERSON

*Ronald C. Machen Jr. / RCM*  
Attorney of the United States in  
and for the District of Columbia

U.S. District and Bankruptcy Courts  
for the District of Columbia

**A TRUE COPY**

ANGELA D. CAESAR, Clerk

By Mark Coates 1/17/12  
Deputy Clerk